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**BY ECF**

The Honorable Andrew L. Carter, Jr.  
U.S. District Judge  
U.S. District Court for the Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007

Re: Floyd v. New York Public Radio, 23-CV-1096 (ALC-SC)

Dear Judge Carter:

In accordance with Your Honor's June 29, 2023 Order (Dkt. 15), we respectfully submit this joint status letter to inform Your Honor that plaintiff Jami Floyd will file an Amended Complaint on or before July 18, 2023. Once the Amended Complaint is filed, defendant New York Public Radio will have ten (10) days to determine if it will file an Answer to the Amended Complaint or file a motion to dismiss. Below please find a proposed schedule of dates:

- Amended Complaint to be filed on or before July 18, 2023, and NYPR will review the Amended Complaint and determine a responsive pleading on or before July 28, 2023;
- If an Answer will be filed, the Answer shall be due on or before August 11, 2023;
- If NYPR decides to file a motion to dismiss, the parties propose the following briefing schedule:
  - Moving papers filed on August 25, 2023;
  - Opposition papers filed on September 25, 2023; and
  - Reply papers filed on October 18, 2023.

Please let the parties' counsel know if Your Honor has any questions or needs additional information.

Respectfully submitted,

CERASIA LAW LLC



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cc: All Counsel of Record (By ECF)